

EXHIBIT J

1 UNITED STATES DISTRICT COURT
2 WESTERN DISTRICT OF WASHINGTON
3 AT TACOMA

4 UGOCHUKWU GOODLUCK NWAUZOR,)
5 FERNANDO AGUIRRE-URBINA,)
6 individually and on behalf of)
7 all those similarly situated,)
8)

9 Plaintiffs/Counter-Defendants.)

10 vs.)

NO. 3:17-CV-05769-RJB

11 THE GEO GROUP, Inc.,)
12)
13 Defendant/Counter-Claimant.)

14 DEPOSITION UPON ORAL EXAMINATION OF SEAN MURPHY

15 Thursday, December 19, 2019
16 Tumwater, Washington
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NWAUZOR vs GEO GROUP
 Sean Murphy, 12/19/2019

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I N D E X

EXAMINATION	PAGE/LINE	
MS. MELL	5	19
MS. BRENNEKE	50	15

E X H I B I T I N D E X

EXHIBIT NO.	DESCRIPTION	PAGE/LINE	
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1 the ICE Northwest Processing Center should be paid minimum
2 wage?

3 **A Can you repeat that?**

4 Q Have you taken a position on whether or not detainees at
5 the ICE Processing Center in Tacoma should be paid minimum
6 wage?

7 **A No.**

8 Q Do you have a position on whether or not people within the
9 State's custody should work?

10 MS. BRENNEKE: Object to the form. Overly
11 broad.

12 **A I have a position that the folks under my purview have an**
13 **opportunity to be successfully returned to the community by**
14 **effective work programs that help educate them, help teach**
15 **them responsibility, and help get them back into**
16 **communities so that they can recapture their lives and**
17 **become productive citizens.**

18 Q (By Ms. Mell) And are work programs a component of that
19 policy objective?

20 **A So -- so for -- for the programs under my purview, work**
21 **programs are an effective tool that's used to get folks**
22 **prepared for reentry. That's one of our goals, is to get**
23 **folks back out in the community and allow them to live**
24 **productive, healthy lives.**

25 Q Do you know whether or not the policy objectives are the

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1 same at the Northwest Detention Center?

2 **A I do not.**

3 Q What kind of work do you have people within the State's
4 custody do?

5 MS. BRENNEKE: Object to the form of the
6 question. Overly broad; foundation.

7 **A So the programs that are under our purview, under my**
8 **purview, range from, you know, at one facility helping with**
9 **laundry and sorting. We really try and find anything that**
10 **we can get folks to do that teach them the skills to show**
11 **up on time, follow direction, and have a feeling of**
12 **responsibility that helps reinstall self-confidence,**
13 **self-worth.**

14 Q (By Ms. Mell) But these are individuals -- strike that.
15 There are individuals in the State's custody doing
16 work for the State who have skills when the State takes
17 custody of them, correct?

18 MS. BRENNEKE: Object to the form. Overly
19 broad.

20 Counsel, would it be permissible for you to direct
21 questions to him only about DSHS? I can avoid some of my
22 objections that way, but I'm concerned that your questions
23 are overly broad, and it's improper. Yes, are we
24 understanding that?

25 MS. MELL: I heard your objection, Counsel.